

### **REMARKS/ARGUMENTS**

This paper is in response to the Office Action of July 6, 2006. Applicants have amend independent claims 1 and 12. Claim 20 has been added. The amended claims introduce no new matter and are fully supported by the specification. Claim 14 has not been examined in the previous Office action and the Applicants respectfully request that the Examiner address the features of claim 14.

#### **Rejections under 35 U.S.C. §102**

In light of the amendments to claims 1 and 12, Applicants respectfully request that the rejections under 35 USC 102 be withdrawn. In particular, the cited reference does not disclose scrubbing a top surface of the wafer with a first cleaning brush that applies a chemical solution to the top surface of the wafer while contemporaneously scrubbing a bottom surface of the wafer with a second brush; and raising the first cleaning brush from contact with the top surface of the wafer. The cited reference is also incapable of being modified to render the amended claims obvious as this would require a substantial redesign and change the principle of operation of the reference.

As independent claims 1 and 12 have now been amended to place them in condition for allowance, dependent claims 2-7, 9-11, 13, 15, 16, 18, and 19 can no longer be deemed anticipated or unpatentable over the cited reference because they recite further limitations off of allowable subject matter. Accordingly, Applicants respectfully submit that claims 1-20 are in condition for allowance.

In view of the foregoing amendments and remarks, Applicant respectfully submits that the pending claims are in condition for allowance. Applicant respectfully requests reconsideration of the application and allowance of the pending claims.

If the Examiner has any questions concerning the present Amendment, the Examiner is kindly requested to contact the undersigned at (408) 774-6921.

If any additional fees are due in connection with filing this Amendment, the Commissioner is also authorized to charge Deposit Account No. 50-0805 (Order No. LAM1P108D). A duplicate copy of the transmittal is enclosed for this purpose.

Respectfully submitted,  
MARTINE PENILLA & GENCARELLA, LLP

A handwritten signature in black ink, appearing to read 'Michael L. Gencarella', is written over a horizontal line.

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